

## **REMARKS**

Claims 1 – 33 were pending in the application. Claims 14, 15, and 20-33 have been cancelled. Claims 34-36 have been added. Claims 1, 10, 11, and 13 have been amended. Accordingly, claims 1-13, 16-19, and 34-36 are now pending in the application.

The Examiner indicated restriction to one of several inventions is required under 35 U.S.C. § 121. Applicant hereby affirms the election made via a telephone conversation with the Examiner on December 2, 2004. Specifically, Applicant elects without traverse the claims of Group I, namely Claims 1-20 and 26-28, for further prosecution in this application. Applicant reserves the right to file a divisional application to further the prosecution of Claims 21-25, and 29-33.

Claims 1-20, and 26-28 stand rejected under 35 U.S.C. §102(e) as being anticipated by Bouchier et al. (U.S. Patent Number 6,725,317) (hereinafter 'Bouchier'). Applicant respectfully traverses this rejection.

Claims 4-5 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bouchier in view of Comer "Computer Networks and Internets" (hereinafter 'Comer'). Applicant respectfully traverses this rejection.

Claims 8 and 13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bouchier. Applicant respectfully traverses this rejection.

Applicant discloses in paragraphs 29, 39, and 40 a system in which

"...the system resources (e g., processor boards 125, I/O boards 130) of the computer system 100 may be dynamically subdivided into a plurality of system domains, where each domain may have a separate boot disk to execute a specific instance of an operating system, separate disk storage, network interfaces, and/or I/O interfaces. Each domain may essentially

operate as a separate machine that performs a variety of user-configured services. For example, one or more domains may be designated as an application server, a web server, database server, etc. ...

Turning now to FIG. 5, a hot-swappable, bootable cassette 500, according to one embodiment of the present invention, is shown. In the illustrated embodiment, the cassette 500 is an embodiment of a hot-swappable carrier for one of the PCI cards 370 shown in FIGS. 3 and 4. The cassette 500 includes a connector 503 for connecting to the PCI controller 365, shown in FIGS. 3 and 4. ... The PCI bridge 510 is shown coupled through a connector pair 504 and 505 to a plurality of I/O (or storage) controllers, a SCSI (Small Computer Systems Interface, ANSI X3.131-1986) controller 530 using PCI and JTAG (see below) signals and a RIO.TM. ... The SCSI controller 530 is coupled to a SCSI storage device 535 and a SCSI port 540 on the SCSI bus. ...

[0040] In one embodiment, the SCSI storage device 535 is a hard disk drive. The hard disk drive may be a bootable device, capable of booting a domain in the multiple domain computer system 100.” (Emphasis added)

Accordingly, claim 1 recites a device comprising in pertinent part

“a bus bridge coupled to the first connector;  
a storage controller coupled to the bus bridge; and  
a bootable storage device connected to the storage controller,  
wherein the bootable storage device is operable to boot a  
domain in a multiple domain computer system.”  
(Emphasis added)

The Examiner asserts that Bouchier teaches each and every element in Applicant’s claim 1. Specifically, the Examiner asserts that Bouchier teaches a storage controller coupled to the bus bridge and alleges that bus arbiter 317 is a storage controller for controlling storages. Applicant respectfully disagrees the Examiner’s characterization of Bouchier and his assertions.

Bouchier discloses at col. 7, lines 55-64

“The Processor Agent 301 (PA), which is an ASIC that connects the system processors 302 to system memory, the fabric, I/O, and PDH.  
5. The cell micro-controller 304 (CM), which is a micro-controller chip 312 with its boot flash ROM 308 and SRAM 310 and a USB connection to the service processor 101. The CM can access PDH NVRAM 311 via the bus arbiter 317.  
6. The bus arbiter 317 which arbitrates requests from the PA 301 and the CM 304 to read or write into PDH memory space.” (Emphasis added)

Bouchier also discloses at col. 8, lines 52-56

“Bus arbiter 317 is used to arbitrate CM PDH bus usage and PA PDH bus usage. Thus, the cell micro-controller 312 and the PA 301 can make interleaved accesses to PDH devices. System processor transactions can be directed down through the arbiter chip into PDH NVRAM memory 311”  
(Emphasis added)

From the foregoing, it is clear that the bus arbiter 317 of Bouchier is an arbiter and not a storage controller as the Examiner has alleged. As evidenced by Bouchier, the bus arbiter 317 is used just as it would be expected to be used in any computer system, to arbitrate bus requests. Just because bus arbiter 317 arbitrates the buses connecting the chip microcontroller 312 to the PDH NVRAM does not make bus arbiter 317 a storage controller. Furthermore, it is well known that microcontroller chips typically include an on-chip memory controller, which would render the idea of using a separate storage controller both redundant and unnecessary. Thus, Applicant submits that bus arbiter 317 is not a memory or storage controller. Accordingly, Applicant submits Bouchier does not teach or disclose “a storage controller coupled to the bus bridge” as recited in Applicant’s claim 1.

Furthermore, in one embodiment of Applicant’s invention the storage device is a hard disk drive such as a SCSI disk drive, and the controller a SCSI controller. This is in stark contrast to the arbiter unit of Bouchier.

Thus, Applicant submits that claim 1, along with its dependent claims, patentably distinguishes over Bouchier for the reasons given above.

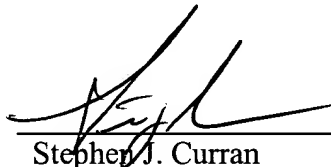
Applicant’s claim 10 recites features that are similar to the features recited in claim 1. Thus, Applicant believes claim 10, along with its dependent claims, to patentably distinguish over Bouchier for at least the reasons given above.

**CONCLUSION**

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-52300/SJC.

Respectfully submitted,



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